

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

\*

NATIONAL MORTGAGE  
WAREHOUSE, LLC

v.

\*

\* Case No. CCB-00-CV-2881

BANKERS FIRST MORTGAGE CO., *et.al* \*

\* \* \* \* \*

**MOTION OF DIANE BAKLOR FOR EXTENSION OF TIME TO FILE REPLY  
IN SUPPORT OF HER MOTION FOR SUMMARY JUDGMENT**

Third-party defendant Diane Baklor, through counsel, Andrew C. White and Susan Q. Amiot, respectfully requests an extension of time to file her Reply in support of her Motion for Summary Judgment, and in support of this motion states as follows:

1. On April 8, 2004, after receiving an extension of time by the Court, Defendant and Third-Party Plaintiff Christopher Trikeriotis filed his Response in Opposition to Ms. Baklor's motion for summary judgment.
2. Due to an unexpectedly busy litigation schedule, in addition to the birth of Mr. White's son last week, counsel for Ms. Baklor seek a thirty-day expansion of time, to May 24, 2004, to file a reply on behalf of Ms. Baklor.
3. Undersigned counsel attempted to contact Mr. Trikeriotis, who is pro se, by telephone and e-mail to inquire whether he consented to this request, but has not heard a response.
4. This extension of time will not prejudice the parties or otherwise delay the schedule in this case, as the Court has, at the request of Mr. Trikeriotis, postponed the trial date. A new trial has not yet been set.

WHEREFORE, Diane Baklor respectfully requests that the Court grant this motion, issue the attached proposed Order, and permit her to file her reply in support of her motion for summary judgment on or before May 24, 2004.

Respectfully submitted,

/S/

Andrew C. White  
Susan Q. Amiot  
Law Offices of Andrew C. White, LLC  
Suite 2600  
201 North Charles Street  
Baltimore, MD 21201  
410-576-2200,

*Counsel For Diane Baklor*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 21<sup>st</sup> day of April, 2004, I sent a copy of the foregoing pleading via Electronic Case Filing to all counsel of record, and that I sent a copy by First Class U.S. Mail, postage prepaid, to:

Christopher Trikeriotis  
14915 Dunstan Lane  
Monkton, MD 21111

/S/

Andrew C. White

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\* \* \* \* \*

**ORDER**

Before the Court is Third-party defendant Diane Baklor's motion for extension of time to file a reply in support of her motion for summary judgment. For good cause shown therein, the Court determines that it will GRANT the motion. Accordingly, it is hereby ORDERED that Diane Baklor shall file her reply in support of her motion for summary judgment on or before May 24, 2004.

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The Honorable Catherine C. Blake

Dated: \_\_\_\_\_, 2004